

# Standard Gas and Liquid Inspection Process

FORM 1, 2 and 3

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Sean Wallace – VA SCC

Jim Fisher – VA SCC



# Agenda

- \* **Form 1, 2 and 3**
  - \* Pre-Inspection
  - \* Inspection
  - \* Post Inspection
- \* **PHMSA Required Questions**
- \* **Form 13 and MIS Datasheets**
- \* **Form 1, 2 and 3 Review**

# What a Form 1, 2 and 3 is not...

- \* **Hazardous Liquid, Gas Transmission or Gas Distribution Integrity Management (IMP Protocol, Form 22/24) Inspection** *(Although you can't have a strong IM program without complete and accurate procedures and records).*
- \* **Public Awareness Program (Form 21) Inspection** *(The Forms do touch on the "effectiveness" of your PAP).*
- \* **Operator Qualification Program (Form 14) Headquarters Inspection** *(Staff may ask for the qualifications of an individual on a specific record, i.e. leak survey, critical valve, etc. or Staff may perform a Protocol 9 in the field).*
- \* **Drug and Alcohol Headquarters Inspection** *(Staff will complete a Form 13 and collect your MIS Datasheets).*

# What a Form 1, 2 and 3 is...

- \* **A review of all revised procedures by the Operator, or revised procedures because of regulation changes, that occurred in the timeframe requested by Staff (*dependent on last Form audit*).**
- \* **A review of records collected by the Operator in the timeframe requested by Staff (*i.e. the year prior, last five years, etc.*).**
- \* **Facility field inspections and O&M field task inspections to determine compliance.**

# Pre-Inspection

- \* **Scheduling**

- \* Staff's goal is to notify Operators early in the calendar year about the audits/inspections to occur (this applies to all types of audits, not just Form 1, 2 and 3). The objective is to pick a time that works best for both parties.

- \* **Communicating**

- \* Staff will send the applicable Form 1, Form 2, Form 3, Form 13, and/or PHMSA questions with the timeline expectation for how far back Staff needs to see records for the audit.

# Inspection – Part 1

## Procedures

### \* **Procedures**

- \* Staff will request your procedures from a determined timeframe for the audit.
  - \* For example, if Staff conducts an annual Form 2 audit, then historic versions of the Operator's procedures will be requested from the previous calendar year with a history/revision log. Our goal is to focus on the changes that occurred in that year.
- \* Staff will review these prior to the in-office audit with the Operator.

# Inspection – Part 2

## Records

- \* **Records**

- \* Staff will audit records for the timeframe requested. I.e. If an annual Form audit is completed, Staff will audit O&M records within each required activity per Part 192/195 (as indicated on the Form) throughout the designated timeframe.
- \* Electronic format is preferred. If your records are at different offices then this should be communicated with Staff prior to the planned in-office audit.

# Inspection – Part 3(a)

## Gas Distribution - Field

- \* **Field** (*each audit*)
  - \* Critical Valves
  - \* Exposed Mains
  - \* Regulators
  - \* O&M Field Activities
    - \* Patrol / Leak Survey
    - \* Corrosion Control Monitoring
    - \* Odorization



# Inspection – Part 3(b)

## Gas Transmission - Field

- \* **Field** (*each audit*)
  - \* All aboveground facilities/stations/infrastructure
  - \* O&M Field Activities
    - \* Patrol / Leak Survey
    - \* Corrosion Control Monitoring
    - \* Odorization, if applicable
    - \* Inspection of ROW's, where visible

# Inspection – Part 3(c)

## Hazardous Liquid - Field

- \* **Field** (*each audit*)
  - \* All aboveground facilities/stations/infrastructure
  - \* O&M Field Activities
    - \* Corrosion Control Monitoring
    - \* Inspection of ROW's, where visible

# Post Inspection

- \* **Follow-up Information Requests**

- \* These will occur in the event Staff needs additional information after conducting the procedures, records or field inspection as part of the audit.

- \* **Items of Concerns**

- \* Staff will send an email/document discussing all concerns from the audit to allow the Operator time to address and provide additional information for Staff to consider PRIOR to Staff sending an official NOI. Note: the severity of the probable violation may skip this step and move straight to NOI.

# PHMSA Required Questions

**From previous NTSB recommendations that PHMSA has requested State's to ask when performing standard natural gas and hazardous liquid inspection audits.**

# PHMSA Required Questions

## Natural Gas Dist/Trans

**Do the operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken?**

# PHMSA Required Questions

## Natural Gas Dist/Trans

**Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance conditions?**

# PHMSA Required Questions

## Natural Gas Dist/Trans

**Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings?** *(Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21)*

# PHMSA Required Questions

## Natural Gas Dist/Trans

**Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617?**



# PHMSA Required Questions

## Natural Gas Dist/Trans

**Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?**

# PHMSA Required Questions

## Natural Gas Dist/Trans

**Please provide the average emergency response time from dispatch to arrival on site. If you have more than one operating area, please provide the average for each.**

# PHMSA Required Questions Hazardous Liquid

- \* If any of the following procedures have been changed or updated, you will be requested to provide the revised procedure:
  - \* Abandoning pipeline facilities
  - \* Analyzing pipeline accidents to determine their causes
  - \* Determining areas of active corrosion
  - \* Directional drilling/boring

# Form 13 and MIS Datasheet

- \* The Form 13 is a Drug and Alcohol question set that focuses on specific requirements of Part 199.
- \* The MIS Datasheet contains the testing metrics supporting an Operator's Drug and Alcohol plan, written to comply with Part 199. The MIS will be requested after June for the previous calendar year.

*Note: This is not a comprehensive Drug and Alcohol Headquarters Inspection.*

# Form 1, 2 and 3 Review

- \* Let's go through each Form and Staff will explain each section in general detail.
- \* Ask any questions you can think of. I.e. “what would be an example to satisfy a Form X, Question Y, on Page Z?”.